



PROPOSED

PERMIT TO OPERATE 13145
AND
PART 70 MINOR PERMIT MODIFICATION 13145

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EQUIPMENT OWNER:

BreitBurn Energy Company LP

300000

EQUIPMENT OPERATOR:

BreitBurn Energy Company LP

EQUIPMENT LOCATION:

Pinal Lease, Orcutt Hill Oilfield, Santa Barbara County, California

STATIONARY SOURCE/FACILITY:

BreitBurn Energy - Orcutt Hill
Pinal Lease

SSID: 02667
FID: 03322

EQUIPMENT DESCRIPTION:

The equipment subject to this permit is listed in the table at the end of this permit.

PROJECT/PROCESS DESCRIPTION:

This permit authorizes the operation of one 5,000 bbl wastewater tank.

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CONDITIONS:

9.A Standard Administrative Conditions

Section A lists the applicable standard administrative conditions for all equipment in this permit. Conditions listed in this section are enforceable by the USEPA, the APCD, the State of California and the public. Where any reference contained in this section refers to any other part of this permit, that part of the permit referred to is federally enforceable. In case of a discrepancy between the wording of a condition and the applicable federal or APCD rule(s), the wording of the rule shall control.

A.1 Compliance with Permit Conditions:

- (a) The permittee shall comply with all permit conditions in Sections 9.A, 9.B and 9.C.
- (b) This permit does not convey property rights or exclusive privilege of any sort.
- (c) Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application.
- (d) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (e) A pending permit action or notification of anticipated noncompliance does not stay any permit condition.
- (f) Within a reasonable time period, the permittee shall furnish any information requested by the Control Officer, in writing, for the purpose of determining:
 - (i) compliance with the permit, or
 - (ii) whether or not cause exists to modify, revoke and reissue, or terminate a permit or for an enforcement action. [Re: 40 CFR Part 70.6, APCD Rules 1303.D.1]
- (g) In the event that any condition herein is determined to be in conflict with any other condition contained herein, then, if principles of law do not provide to the contrary, the

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condition most protective of air quality and public health and safety shall prevail to the extent feasible.

- A.2 **Emergency Provisions:** The permittee shall comply with the requirements of the APCD, Rule 505 (Upset/Breakdown rule) and/or APCD Rule 1303.F, whichever is applicable to the emergency situation. In order to maintain an affirmative defense under Rule 1303.F, the permittee shall provide the APCD, in writing, a “notice of emergency” within 2 days of the emergency. The “notice of emergency” shall contain the information/documentation listed in Sections (1) through (5) of Rule 1303.F. [*Re: 40 CFR 70.6, APCD Rule 1303.F*]
- A.3 **Compliance Plan:**
- (a) The permittee shall comply with all federally-enforceable requirements that become applicable during the permit term, in a timely manner, as identified in the Compliance Plan.
 - (b) For all applicable equipment, the permittee shall implement and comply with any specific compliance plan required under any federally-enforceable rules or standards. [*Re: APCD Rule 1302.D.2*]
- A.4 **Right of Entry:** The Regional Administrator of USEPA, the Control Officer, or their authorized representatives, upon the presentation of credentials, shall be permitted to enter upon the premises where a Part 70 Source is located or where records must be kept:
- (a) To inspect the stationary source, including monitoring and control equipment, work practices, operations, and emission-related activity;
 - (b) To inspect and duplicate, at reasonable times, records required by this Permit to Operate;
 - (c) To sample substances or monitor emissions from the source or assess other parameters to assure compliance with the permit or applicable requirements, at reasonable times. Monitoring of emissions can include source testing. [*Re: APCD Rule 1303.D.2*]
- A.5 **Payment of Fees:** The permittee shall reimburse the APCD for all its Part 70 permit processing and compliance expenses for the stationary source on a timely basis. Failure to reimburse on a timely basis shall be a violation of this permit and of applicable requirements and can result in forfeiture of the Part 70 permit. Operation without a Part 70 permit subjects the source to potential enforcement action by the APCD and the USEPA pursuant to section 502(a) of the Clean Air Act. [*Re: APCD Rules 1303.D.1 and 1304.D.11, 40 CFR 70.6*]

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- A.6 **Prompt Reporting of Deviations:** The permittee shall submit a written report to the APCD documenting each and every deviation from the requirements of this permit or any applicable federal requirements within 7 days after discovery of the violation, but not later than 180-days after the date of occurrence. The report shall clearly document 1) the probable cause and extent of the deviation, 2) equipment involved, 3) the quantity of excess pollutant emissions, if any, and 4) actions taken to correct the deviation. The requirements of this condition shall not apply to deviations reported to APCD in accordance with Rule 505. *Breakdown Conditions*, or Rule 1303.F *Emergency Provisions*. [APCD Rule 1303.D.1, 40 CFR 70.6(a) (3)]
- A.7 **Reporting Requirements/Compliance Certification:** The permittee shall submit compliance certification reports to the USEPA and the Control Officer every six months. These reports shall be submitted on APCD forms and shall identify each applicable requirement/condition of the permit, the compliance status with each requirement/condition, the monitoring methods used to determine compliance, whether the compliance was continuous or intermittent, and include detailed information on the occurrence and correction of any deviations (excluding emergency upsets) from permit requirement. The reporting periods shall be each half of the calendar year, e.g., January through June for the first half of the year. These reports shall be submitted by September 1 and March 1, respectively, each year. Supporting monitoring data shall be submitted in accordance with the “Semi-Annual Monitoring/Compliance Verification Report” condition in section 9.C. The permittee shall include a written statement from the responsible official, which certifies the truth, accuracy, and completeness of the reports. [Re: APCD Rules 1303.D.1, 1302.D.3, 1303.2.c]
- A.8 **Federally-Enforceable Conditions:** Each federally-enforceable condition in this permit shall be enforceable by the USEPA and members of the public. None of the conditions in the APCD-only enforceable section of this permit are federally-enforceable or subject to the public/USEPA review. [Re: CAAA, § 502(b)(6), 40 CFR 70.6]
- A.9 **Recordkeeping Requirements:** Records of required monitoring information shall include the following:
- (a) The date, place as defined in the permit, and time of sampling or measurements;
 - (b) The date(s) analyses were performed;
 - (c) The company or entity that performed the analyses;
 - (d) The analytical techniques or methods used;
 - (e) The results of such analyses; and
 - (f) The operating conditions as existing at the time of sampling or measurement.

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The records (electronic or hard copy), as well as all supporting information including calibration and maintenance records, shall be maintained for a minimum of five (5) years from date of initial entry by BreitBurn Energy and shall be made available to the APCD upon request. [*Re: APCD Rule 1303.D.1.f, 40CFR70.6(a)(3)(ii)(A)*]

- A.10 **Conditions for Permit Reopening:** The permit shall be reopened and revised for cause under any of the following circumstances:
- (a) Additional Requirements: If additional applicable requirements (e.g., NSPS or MACT) become applicable to the source which has an unexpired permit term of three (3) or more years, the permit shall be reopened. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. However, no such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended. All such re-openings shall be initiated only after a 30-day notice of intent to reopen the permit has been provided to the permittee, except that a shorter notice may be given in case of an emergency.
 - (b) Inaccurate Permit Provisions: If the APCD or the USEPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit, the permit shall be reopened. Such re-openings shall be made as soon as practicable.
 - (c) Applicable Requirement: If the APCD or the USEPA determines that the permit must be revised or revoked to assure compliance with any applicable requirement including a federally-enforceable requirement, the permit shall be reopened. Such re-openings shall be made as soon as practicable.

Administrative procedures to reopen and revise/revoke/reissue a permit shall follow the same procedures as apply to initial permit issuance. Re-openings shall affect only those parts of the permit for which cause to reopen exists.

If a permit is reopened, the expiration date does not change. Thus, if the permit is reopened, and revised, then it will be reissued with the expiration date applicable to the re-opened permit. [*Re: 40 CFR 70.7, 40 CFR 70.6*]

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- A.11 **Grounds for Revocation:** Failure to abide by and faithfully comply with this permit shall constitute grounds for the APCO to petition for permit revocation pursuant to California Health & Safety Code Section 42307 *et seq.*
- A.12 **Consistency with Analysis:** Operation under this permit shall be conducted consistent with all data, specifications and assumptions included with the application and supplements thereof (as documented in the APCD's project file) and the APCD's analyses under which this permit is issued as documented in the Permit Analyses prepared for and issued with the permit.
- A.13 **Equipment Maintenance:** The equipment listed in this permit shall be properly maintained and kept in good condition at all times. The equipment manufacturer's maintenance manual, maintenance procedures and/or maintenance checklists (if any) shall be kept on site.
- A.14 **Compliance:** Nothing contained within this permit shall be construed as allowing the violation of any local, state or federal rules, regulations, air quality standards or increments.
- A.15 **Severability:** In the event that any condition herein is determined to be invalid, all other conditions shall remain in force.
- A.16 **Conflict Between Permits.** The requirements or limits that are more protective of air quality shall apply if any conflict arises between the requirements and limits of this permit and any other permitting actions associated with the equipment permitted herein.
- A.17 **Access to Records and Facilities:** As to any condition that requires for its effective enforcement the inspection of records or facilities by the APCD or its agents, the permittee shall make such records available or provide access to such facilities upon notice from the APCD. Access shall mean access consistent with California Health and Safety Code Section 41510 and Clean Air Act Section 114A.
- A.18 **Equipment Identification:** Identifying tag(s) or name plate(s) shall be displayed on the equipment to show manufacturer, model number, and serial number. The tag(s) or plate(s) shall be issued by the manufacturer and shall be affixed to the equipment in a permanent and conspicuous position.
- A.19 **Emission Factor Revisions.** The APCD may update the emission factors for any calculation based on USEPA AP-42 or APCD emission factors at the next permit modification or permit reevaluation to account for USEPA and/or APCD revisions to the underlying emission factors.

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9.B Generic Conditions

The generic conditions listed below apply to all emission units, regardless of their category or emission rates. In case of a discrepancy between the wording of a condition and the applicable federal or APCD rule(s), the wording of the rule shall control.

Section B lists the applicable ‘generic’ permit conditions, including emission standards for all equipment in this permit. Conditions listed in this section are enforceable by the USEPA, the APCD, the State of California and the public. Where any reference contained in this section refers to any other part of this permit, that part of the permit referred to is federally enforceable. In case of a discrepancy between the wording of a condition and the applicable federal or APCD rule(s), the wording of the rule shall control.

- B.1 **Circumvention (Rule 301):** A person shall not build, erect, install, or use any article, machine, equipment or other contrivance, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere, reduces or conceals an emission which would otherwise constitute a violation of Division 26 (Air Resources) of the Health and Safety Code of the State of California or of these Rules and Regulations. This Rule shall not apply to cases in which the only violation involved is of Section 41700 of the Health and Safety Code of the State of California, or of APCD Rule 303. [*Re: APCD Rule 301*]
- B.2 **Nuisance (Rule 303):** No pollutant emissions from any source at the permittee shall create nuisance conditions. Operations shall not endanger health, safety or comfort, nor shall they damage any property or business. [*Re: APCD Rule 303*]
- B.3 **Organic Solvents (Rule 317):** The permittee shall comply with the emission standards listed in Rule 317.B. Compliance with this condition shall be based on the permittee’s compliance with Condition C.5 of PTO 8502-R6 and facility inspections. [*Re: APCD Rule 317*]
- B.4 **Metal Surface Coating Thinner and Reducer (Rule 322):** The use of photochemically reactive solvents as thinners or reducers in metal surface coatings is prohibited. Compliance with this condition shall be based on the permittee’s compliance with Condition C.5 of PTO 8502-R6 and facility inspections. [*Re: APCD Rule 322*]
- B.5 **Architectural Coatings (Rule 323):** The permittee shall comply with the coating ROC content and handling standards listed in Section D of Rule 323 as well as the Administrative requirements listed in Section F of Rule 323. Compliance with this condition shall be based on the permittee’s compliance with Condition C.5 of PTO 8502-R6 and facility inspections. [*Re: APCD Rules 323, 317, 322, 324*]

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- B.6 **Disposal and Evaporation of Solvents (Rule 324):** The permittee shall not dispose through atmospheric evaporation of more than one and a half gallons of any photochemically reactive solvent per day. Compliance with this condition shall be based on the permittee's compliance with Condition C.5 of PTO 8502-R6 and facility inspections. [*Re: APCD Rule 324*]
- B.7 **Emergency Episode Plans (Rule 603):** During emergency episodes, the permittee shall implement the Emergency Episode Plan dated March 30, 1999. [*Reference APCD Rule 603*]
- B.8 **Adhesives and Sealants (Rule 353):** The permittee shall not use adhesives, adhesive bonding primers, adhesive primers, sealants, sealant primers, or any other primers, unless the permittee complies with the following:
- (a) Such materials used are purchased or supplied by the manufacturer or suppliers in containers of 16 fluid ounces or less; or alternately
 - (b) When the permittee uses such materials from containers larger than 16 fluid ounces and the materials are not exempt by Rule 353, Section B.1, the total reactive organic compound emissions from the use of such material shall not exceed 200 pounds per year unless the substances used and the operational methods comply with Sections D, E, F, G, and H of Rule 353. Compliance shall be demonstrated by recordkeeping in accordance with Section B.2 and/or Section O of Rule 353. [*Re: APCD Rule 353*]

9.C Requirements and Equipment Specific Conditions

The conditions of PTO 8502-R6 shall remain in full force and effect for the life of this permit. The following condition and emission tables supersede the corresponding condition and emission tables of PTO 8502-R6:

- C.3 **Wastewater Tanks, Sumps and Pits:** The following equipment are included in this emissions category:

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Dev No	Equipment Name; Capacity, Size
112556	Wastewater tank, 5,000 bbl capacity
107897	Wastewater tank, 1,000 bbl capacity
003076	Sample cut sump, 4 feet in diameter, uncovered
003077	Wastewater sump, 9 feet square, uncovered
003708	Pits (5), each four square feet

- (a) Emission Limits: Mass emission for wastewater tanks #112556 and #107897 shall not exceed the limits listed in Tables 5.1-3 and 5.1-4. Emissions from the pits and sumps are not federally-enforceable.
- (b) Operational Limits: The following limits shall apply:
- (i) All process operations for the equipment listed in this section shall meet the requirements of APCD Rules 325, 343 and 344. Compliance with these limits shall be assessed through compliance with the monitoring, recordkeeping and reporting conditions in this permit.
 - (ii) Pursuant to Rule 343, Sections D, E, F and G, the permittee shall use a control device, approved in advance by the APCD, when degassing or purging any stationary tanks, vessels, or containers which process odorous sulfur compounds. Except for emergency cases, the Control Officer shall be notified in writing at least two weeks prior to the start of the emptying operation for the purpose of degassing any above-ground tank subject to this rule.
- (c) Monitoring: The equipment listed in this section is subject to all the monitoring requirements of APCD Rule 325.H. The test methods outlined in APCD Rule 325.G shall be used, when applicable. In addition, the permittee shall perform the following compliance monitoring:
- (i) The volume of oil (bbls) processed through the Pinal Lease tank battery shall be measured through the use of a calibrated meter or through the use of an APCD-approved alternate method. The meter shall be calibrated according to manufacturer's specifications and the calibration records shall be made available to the APCD upon request.
 - (ii) For all degassing events, monitor the volume purged, characteristics of the vapor purged, and control device/method used.

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- (d) **Recordkeeping:** The tanks listed in this section are subject to all the recordkeeping requirements listed in APCD Rule 325.F. In addition, the permittee shall record the following:
 - (i) The volume of crude oil processed through the Pinal Tank battery each month and the number of days each month that crude oil were processed through the tank battery.
 - (ii) The permittee shall maintain a log of all degassing events, and record all the parameters listed in Section 9.C.3.(c)(i) of Pt70 PTO 8502-R6
- (e) **Reporting:** On a semi-annual basis, a report detailing the previous six-month's activities shall be provided to the APCD. The report must list all data required by the *Semi-Annual Compliance Verification Reports* condition of Pt70 PTO 8502-R6, as well as, the total volume (bbls) of oil processed through the Pinal Lease tank battery each month and each calendar year, and the number of days each month that oil was processed.

9.D APCD-Only Conditions

The following section lists permit conditions that are not enforceable by the USEPA or the public. However, these conditions are enforceable by the APCD and the State of California. These conditions are issued pursuant to APCD Rule 206 (*Conditional Approval of Authority to Construct or Permit to Operate*), which states that the Control Officer may issue an operating permit subject to specified conditions. Permit conditions have been determined as being necessary for this permit to ensure that operation of the facility complies with all applicable local and state air quality rules, regulations and laws. Failure to comply with any condition specified pursuant to the provisions of Rule 206 shall be a violation of that rule, this permit, as well as any applicable section of the California Health & Safety Code.

- D.1 **Permit Activation.** All aspects of this permit are enforceable by the APCD and the State of California upon the issuance date stamped below. The Part 70 aspects of this permit are not final until:
 - (a) The USEPA has provided written comments to the APCD and these comments require no modification to this permit. The APCD will issue a letter stating that this permit is a final Part 70 permit. The effective date that this permit will be considered a final Part 70 permit will be the

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date stamped on the APCD's letter.

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- (b) After the USEPA has provided the APCD written comments that require a modification to this permit, the APCD will modify this permit to address the USEPA's comments and issue the Part 70 permit as final. The re-issued permit will supersede this permit in its entirety.

AIR POLLUTION CONTROL OFFICER

DATE

Attachments:

- Emission Limit Tables
- Permit Equipment List
- Permit Evaluation for Permit to Operate 13145

Notes:

- Reevaluation Due Date: June 2, 2012
- Stationary sources are subject to an annual emission fee (see Fee Schedule B-3 of Rule 210).
- This permit supersedes Authority to Construct 13145

Table 5.1-1
BreitBurn Pinal Lease: Permit to Operate 13145
Operating Equipment Description

			Device Specifications				Usage Data		Maximum Operating Schedule					
Equipment Category	Description	Dev No	Feed	Parameter	Size	Units	Capacity	Units	Load	hr	day	qtr	year	References
Tanks				TVP										
	Wash Tank	003043	O/W	3.075	3,000 bbls		1,000 bbl/day		1.0	1.0	24	2,190	8,760	A
	Crude Tank	003045	Oil	3.075	3,000 bbls		1,000 bbl/day		1.0	1.0	24	2,190	8,760	A
	Crude Tank	003046	Oil	3.075	2,000 bbls		1,000 bbl/day		1.0	1.0	24	2,190	8,760	A
	Wastewater Tank	003047	Water	3.075	5,000 bbls	--	--		1.0	1.0	24	2,190	8,760	B
	Wastewater Tank	107897	Water	3.075	1,000 bbls	--	--		1.0	1.0	24	2,190	8,760	B
Pits and Sumps				Service										
	Well Cellars	003074	O/W	Primary	360 ft²	--	--		1.0	1.0	24	2,190	8,760	B
	Spill Catch Pans	101198	O/W	Primary	12 ft²	--	--		1.0	1.0	24	2,190	8,760	B
	Sample Cut Sump	003076	O/W	Primary	4 ft²	--	--		1.0	1.0	24	2,190	8,760	B
	Wastewater Pit	003077	O/W	Secondary	81 ft²	--	--		1.0	1.0	24	2,190	8,760	B
	Pits	003078	O/W	Secondary	80 ft²	--	--		1.0	1.0	24	2,190	8,760	B
Shipping Equipment	Crude Loading Rack	003049	Oil	--	--	--	160 bbl/hour		1.0	1.0	24	570	2,281	C
Fugitive Components	Valves, Connections, etc	003072	--	--	14 wells	--	--		1.0	1.0	24	2,190	8,760	D
	Pumps/Compressors/Wellheads	003073	--	--	14 wells	--	--		1.0	1.0	24	2,190	8,760	

Table 5.1-2
BreitBurn Pinal Lease: Permit to Operate 13145
Equipment Emission Factors

Emission Factors									
Equipment Category	Description	Dev No	NO _x	ROC	CO	SO _x	PM	PM ₁₀	Units
Tanks	Wash Tank	003043	See attached worksheets for emission factors.						
	Crude Tank	003045							
	Crude Tank	003046							
	Wastewater Tank	003047	--	0.0006	--	--	--	--	lb/ft ² -day
	Wastewater Tank	107897	--	0.0006	--	--	--	--	lb/ft ² -day
Pits and Sumps	Well Cellars	003074	--	0.0282	--	--	--	--	lb/ft ² -day
	Spill Catch Pans	101198	--	0.0941	--	--	--	--	lb/ft ² -day
	Sample Cut Sump	003076	--	0.0941	--	--	--	--	lb/ft ² -day
	Wastewater Pit	003077	--	0.0126	--	--	--	--	lb/ft ² -day
	Pits	003078	--	0.0126	--	--	--	--	lb/ft ² -day
Shipping Equipment	Crude Loading Rack	003049	--	0.0993	--	--	--	--	lb/1,000 gal
Fugitive Components	Valves, Connections, etc	003072	--	--	--	--	--	--	--
	Pumps/Compressors/Wellheads	003073	--	--	--	--	--	--	--

**Table 5.1-3
BreitBurn Pinal Lease: Permit to Operate 13145
Hourly and Daily Emissions**

Equipment Category	Description	Dev No	NO _x		ROC		CO		SO _x		PM		PM ₁₀		Enforceability	
			lb/hr	lb/day	lb/hr	lb/day	lb/hr	lb/day	lb/hr	lb/day	lb/hr	lb/day	lb/hr	lb/day	Type	Basis
Tanks	Wash Tank	003043	--	--	0.00	0.04	--	--	--	--	--	--	--	--	FE	ATC 7030
	Crude Tank	003045	--	--	0.04	0.97	--	--	--	--	--	--	--	--	FE	ATC 7030
	Crude Tank	003046	--	--	0.03	0.78	--	--	--	--	--	--	--	--	FE	ATC 7030
	Wastewater Tank	003047	--	--	0.03	0.74	--	--	--	--	--	--	--	--	FE	ATC 9481
	Wastewater Tank	107897	--	--	0.02	0.44	--	--	--	--	--	--	--	--	FE	ATC 7030
Pits and Sumps	Well Cellars	003074	--	--	0.42	10.16	--	--	--	--	--	--	--	--	A	--
	Spill Catch Pans	101198	--	--	0.05	1.13	--	--	--	--	--	--	--	--	A	--
	Sample Cut Sump	003076	--	--	0.02	0.38	--	--	--	--	--	--	--	--	A	--
	Wastewater Pit	003077	--	--	0.04	1.02	--	--	--	--	--	--	--	--	A	--
	Pits	003078	--	--	0.04	1.01	--	--	--	--	--	--	--	--	A	--
Shipping Equipment	Crude Loading Rack	003049	--	--	11.81	283.35	--	--	--	--	--	--	--	--	A	--
Fugitive Components	Valves, Connections, etc	003072	--	--	0.33	7.85	--	--	--	--	--	--	--	--	A	--
	Pumps/Compressors/Wellheads	003073	--	--	0.01	0.23	--	--	--	--	--	--	--	--	A	--

Notes:

A = APCD enforceable emission limit.

**Table 5.1-4
BreitBurn Pinal Lease: Permit to Operate 13145
Quarterly and Annual Emissions**

Equipment Category	Description	Dev No	NO _x		ROC		CO		SO _x		PM		PM ₁₀		Enforceability	
			TPQ	TPY	TPQ	TPY	TPQ	TPY	TPQ	TPY	TPQ	TPY	TPQ	TPY	Type	Basis
Tanks	Wash Tank	003043	--	--	0.00	0.01	--	--	--	--	--	--	--	--	FE	ATC 7030
	Crude Tank	003045	--	--	0.04	0.18	--	--	--	--	--	--	--	--	FE	ATC 7030
	Crude Tank	003046	--	--	0.04	0.14	--	--	--	--	--	--	--	--	FE	ATC 7030
	Wastewater Tank	003047	--	--	0.03	0.14	--	--	--	--	--	--	--	--	FE	ATC 9481
	Wastewater Tank	107897	--	--	0.02	0.08	--	--	--	--	--	--	--	--	FE	ATC 7030
Pits and Sumps	Well Cellars	003074	--	--	0.46	1.85	--	--	--	--	--	--	--	--	A	--
	Spill Catch Pans	101198	--	--	0.05	0.21	--	--	--	--	--	--	--	--	A	--
	Sample Cut Sump	003076	--	--	0.02	0.07	--	--	--	--	--	--	--	--	A	--
	Wastewater Pit	003077	--	--	0.05	0.19	--	--	--	--	--	--	--	--	A	--
	Pits	003078	--	--	0.05	0.18	--	--	--	--	--	--	--	--	A	--
Shipping Equipment	Crude Loading Rack	003049	--	--	3.37	13.47	--	--	--	--	--	--	--	--	A	--
Fugitive Components	Valves, Connections, etc	003072	--	--	0.36	1.43	--	--	--	--	--	--	--	--	A	--
	Pumps/Compressors/Wellheads	003073	--	--	0.01	0.04	--	--	--	--	--	--	--	--	A	--

Notes:

A = APCD enforceable emission limit.

FE = Federally enforceable emission limit.

Table 5.2
BreitBurn Pinal Lease: Permit to Operate 13145
Total Permitted Facility Emissions

A. HOURLY (lb/hr)

Equipment Category	NO _x	ROC	CO	SO _x	PM	PM ₁₀
Tanks	--	0.12	--	--	--	--
Pits and Sumps	--	0.57	--	--	--	--
Shipping Equipment	--	11.81	--	--	--	--
Fugitive Components	--	0.34	--	--	--	--
	0.00	12.84	0.00	0.00	0.00	0.00

B. DAILY (lb/day)

Equipment Category	NO _x	ROC	CO	SO _x	PM	PM ₁₀
Tanks	--	2.97	--	--	--	--
Pits and Sumps	--	13.70	--	--	--	--
Shipping Equipment	--	283.35	--	--	--	--
Fugitive Components	--	8.08	--	--	--	--
	0.00	308.10	0.00	0.00	0.00	0.00

C. QUARTERLY (tpq)

Equipment Category	NO _x	ROC	CO	SO _x	PM	PM ₁₀
Tanks	--	0.14	--	--	--	--
Pits and Sumps	--	0.62	--	--	--	--
Shipping Equipment	--	3.37	--	--	--	--
Fugitive Components	--	0.37	--	--	--	--
	0.00	4.50	0.00	0.00	0.00	0.00

D. ANNUAL (tpy)

Equipment Category	NO _x	ROC	CO	SO _x	PM	PM ₁₀
Tanks	--	0.54	--	--	--	--
Pits and Sumps	--	2.50	--	--	--	--
Shipping Equipment	--	13.47	--	--	--	--
Fugitive Components	--	1.47	--	--	--	--
	0.00	17.99	0.00	0.00	0.00	0.00

Table 5.3
BreitBurn Pinal Lease: Permit to Operate 13145
Federal Potential To Emit

A. HOURLY (lb/hr)

Equipment Category	NO _x	ROC	CO	SO _x	PM	PM ₁₀
Tanks	--	0.12	--	--	--	--
Pits and Sumps	--	0.57	--	--	--	--
Shipping Equipment	--	11.81	--	--	--	--
Exempt Surface Coating	--	0.01	--	--	--	--
	0.00	12.51	0.00	0.00	0.00	0.00

B. DAILY (lb/day)

Equipment Category	NO _x	ROC	CO	SO _x	PM	PM ₁₀
Tanks	--	2.97	--	--	--	--
Pits and Sumps	--	13.70	--	--	--	--
Shipping Equipment	--	283.35	--	--	--	--
Exempt Surface Coating	--	0.01	--	--	--	--
	0.00	300.03	0.00	0.00	0.00	0.00

C. QUARTERLY (tpq)

Equipment Category	NO _x	ROC	CO	SO _x	PM	PM ₁₀
Tanks	--	0.14	--	--	--	--
Pits and Sumps	--	0.62	--	--	--	--
Shipping Equipment	--	3.37	--	--	--	--
Exempt Surface Coating	--	0.01	--	--	--	--
	0.00	4.14	0.00	0.00	0.00	0.00

D. ANNUAL (tpy)

Equipment Category	NO _x	ROC	CO	SO _x	PM	PM ₁₀
Tanks	--	0.54	--	--	--	--
Pits and Sumps	--	2.50	--	--	--	--
Shipping Equipment	--	13.47	--	--	--	--
Exempt Surface Coating	--	0.01	--	--	--	--
	0.00	16.52	0.00	0.00	0.00	0.00

DRAFT

Equipment List for Permit to Operate 13145

Page 1 of 1

PERMIT EQUIPMENT LIST - TABLE A

PTO 13145 / FID: 03322 Pinal Lease / SSID: 02667

A PERMITTED EQUIPMENT

1 Wastewater Tank

<i>Device ID #</i>	112556	<i>Device Name</i>	Wastewater Tank
<i>Rated Heat Input</i>		<i>Physical Size</i>	5000.00 BBL
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Pinal Lease		
<i>Device</i>	38.7' dia. by 24' high, connected to the vapor recovery system.		
<i>Description</i>			



PROPOSED

PERMIT EVALUATION FOR PERMIT TO OPERATE 13145

Page 1 of 4

1.0 BACKGROUND

1.1 General: Authority to Construct 13145 was issued June 15, 2009 to replace an existing 5,000 bbl wastewater tank at the Pinal Lease. The Source Compliance Demonstration Period (SCDP) was conducted on December 3, 2009. The inspection report indicates that the SCDP conditions were satisfied. Application for Permit to Operate 13145 was received on December 28, 2009.

1.2 Permit History: The following are the most recent permits for this facility:

PERMIT	FINAL ISSUED	PERMIT DESCRIPTION
PT-70/Reeval 08502 R5	03/29/2006	Three year permit reevaluation.
PTO 11982	12/14/2006	Replace an existing 1,000 bbl wastewater tank with a new 1,000 bbl wastewater tank.

1.3 Compliance History: The following are the most recent compliance actions for this facility:

VIOLATION TYPE	NUMBER	ISSUE DATE	DESCRIPTION OF VIOLATION
NOV	8973	11/09/2007	Two old patches leaking at 40,000 ppm and 50,000+ ppm.
NOV	8974	11/09/2007	The bath hatch on the 5,000 bbl wastewater tank was dry.
NOV	9161	02/13/2009	No water in the water bath hatch.

2.0 ENGINEERING ANALYSIS

2.1 Equipment/Processes: The wastewater tank is used to store produced water prior to reinjection into the producing formation. The tank is connected to vapor recovery.

2.2 Emission Controls: A fugitive hydrocarbon inspection and maintenance program is used to comply with APCD Rule 331. An 80-percent reduction is applied to valves, fittings, and wellheads for

PROPOSED

PERMIT EVALUATION FOR PERMIT TO OPERATE 13145

Page 2 of 4

implementation of Rule 331. The tank will be equipped with a vapor recovery system. A 95-percent control efficiency is applied for the use of vapor recovery.

- 2.3 Emission Factors: Emission factors for the tank emission are documented in the attached emission calculation worksheet.
- 2.4 Reasonable Worst Case Emission Scenario: Worst case emissions are based on operation of this facility at maximum permitted throughput levels, 24 hours/day, 365 days per year.
- 2.5 Emission Calculations: A detailed emission calculation spreadsheet may be found in Attachment "A". These emissions define the Potential to Emit for the permitted equipment. Since the emissions from the subject tank are identical to those from the tank that was replaced, the emission tables included in this permit are identical to those in the associated Pt70 PTO 8502-R6.
- 2.6 Special Calculations: There are no special calculations.
- 2.7 BACT Analyses: Best Available Control Technology was not required for this project.
- 2.8 Enforceable Operational Limits: The permit has enforceable operating conditions that ensure the control device is operated properly.
- 2.9 Monitoring Requirements: Monitoring of the equipment's operational limits are required to ensure that the emission limits are enforceable. This permit requires monitoring the volume of oil produced. Also monitored are the parameters required by APCD Rules 325.F and 331.G.
- 2.10 Recordkeeping and Reporting Requirements: The permit requires that the volume of oil produced shall be monitored, recorded and reported to the APCD.

3.0 REEVALUATION REVIEW (not applicable)

4.0 REGULATORY REVIEW

- 4.1 Partial List of Applicable Rules: This project is anticipated to operate in compliance with the following rules:

Rule 101. Compliance of Existing Facilities
Rule 202. Exemptions to Rule 201
Rule 205. Standards for Granting Permits
Rule 303. Nuisance
Rule 325. Crude Oil Production and Separation
Rule 331. Fugitive Emissions Inspection and Maintenance
Rule 505. Breakdown Procedures

PROPOSED

PERMIT EVALUATION FOR PERMIT TO OPERATE 13145

Page 3 of 4

- Rule 801. New Source Review
- Rule 802. Nonattainment Review
- Rule 803. Prevention of Significant Deterioration

4.2 Rules Requiring Review: None.

4.3 NEI Calculations: The net emission increase calculation is used to determine whether certain requirements must be applied to a project (e.g., offsets, AQIA, PSD BACT). The ROC emissions increase for the new tank constitutes an “I” term. A “D” term applied for the removal of the old wastewater tank. The emissions for wastewater tanks are based on surface area, both the old and new tanks have the same surface area, thus the “I” term from the new tank is equal to the “D” term from the old tank and the NEI for this project is zero.

5.0 AQIA

The project is not subject to the Air Quality Impact Analysis requirements of Regulation VIII.

6.0 OFFSETS/ERCs

6.1 Offsets: The emission offset thresholds of Regulation VIII are not exceeded.

6.2 ERCs: This project does not generate emission reduction credits.

7.0 AIR TOXICS

An air toxics health risk assessment was not performed for this permitting action.

8.0 CEQA / LEAD AGENCY

This project is exempt from CEQA pursuant to the Environmental Review Guidelines for the Santa Barbara County APCD (revised November 16, 2000). Appendix A (*APCD Projects Exempt from CEQA and Equipment or Operations Exempt from CEQA*) provides an exemption specifically for permits to operate. No further action is necessary.

9.0 SCHOOL NOTIFICATION

A school notice pursuant to the requirements of H&SC §42301.6 was not required.

10.0 PUBLIC and AGENCY NOTIFICATION PROCESS

This project was not subject to public notice.

11.0 FEE DETERMINATION

Fees for the APCD’s work effects are assessed on a fee basis. The Project Code is 300000 (*Onshore Oil and Gas Lease*). See the *Fee Statement* Attachment for the fee calculations.

PROPOSED

PERMIT EVALUATION FOR PERMIT TO OPERATE 13145

Page 4 of 4

12.0 RECOMMENDATION

It is recommended that this permit be granted with the conditions as specified in the permit.

<u>J. Menno</u>	<u>06/2010</u>	<u></u>	<u>06/2010</u>
AQ Engineer	Date	Engineering Supervisor	Date

13.0 ATTACHMENTS

- A. Emission Calculations
- B. IDS Tables
- C. Fee Statement

ATTACHMENT A

Emission Calculations

FUGITIVE HYDROCARBON CALCULATIONS - CARB/KVB METHOD

Page 1 of 2

ADMINISTRATIVE INFORMATION
Attachment: A-1
Company: BreitBurn
Facility: Pinal Lease
Processed by: JJM
June 1, 2010
Path & File Name:

Version: fhc-kvb5.xls
Date: 24-Oct-00

Reference: CARB speciation profiles #s 529, 530, 531, 532

Data	Value	Units
Number of Active Wells at Facility	0	wells
Facility Gas Production		scf/day
Facility Dry Oil Production		bbls/day
Facility Gas to Oil Ratio (if > 500 then default to 501)	501	scf/bbl
API Gravity	22	degrees API
Facility Model Number	1	dimensionless
No. of Steam Drive Wells with Control Vents	0	wells
No. of Steam Drive Wells with Uncontrolled Vents	0	wells
No. of Cyclic Steam Drive Wells with Control Vents	0	wells
No. of Cyclic Steam Drive Wells with Uncontrolled Vents	0	wells
Composite Valve and Fitting Emission Factor	2.4868	lb/day-well

Lease Model	Valve ROG Emission Factor Without Ethane	Fitting ROG Emission Factor Without Ethane	Composite ROG Emission Factor Without Ethane	
1	1.4921	0.9947	2.4868	lbs/day-well
2	0.6999	0.6092	1.3091	lbs/day-well
3	0.0217	0.0673	0.0890	lbs/day-well
4	4.5090	2.1319	6.6409	lbs/day-well
5	0.8628	1.9424	2.8053	lbs/day-well
6	1.7079	2.5006	4.2085	lbs/day-well

Model #1: Number of wells on lease is less than 10 and the GOR is less than 500.
 Model #2: Number of wells on lease is between 10 and 50 and the GOR is less than 500.
 Model #3: Number of wells on lease is greater than 50 and the GOR is less than 500.
 Model #4: Number of wells on lease is less than 10 and the GOR is greater than 500.
 Model #5: Number of wells on lease is between 10 and 50 and the GOR is greater than 500.
 Model #6: Number of wells on lease is greater than 50 and the GOR is greater than 500.

ROC Emission Calculation Summary Results Table Reactive Organic Compounds^(c)

	lbs/hr	lbs/day	tons/year
Valves and Fittings ^(a)	0.00	0.00	0.00
Sumps, Wastewater Tanks and Well Cellars ^(b)	0.03	0.74	0.14
Oil/Water Separators ^(b)	0.00	0.00	0.00
Pumps/Compressors/Well Heads ^(a)	0.00	0.00	0.00
Enhanced Oil Recovery Fields	0.00	0.00	0.00
Total Facility FHC Emissions (ROC)	0.03	0.74	0.14

a: Emissions amount reflect an 80% reduction due to Rule 331 implementation.
 b: Emissions reflect control efficiencies where applicable.
 c: Due to rounding, the totals may not appear correct

Page 2 of 2
Emission Calculation by Emission Unit

Pumps, Compressors, and Well Heads Uncontrolled Emission Calculations

Number of Wells	0	wells
Wellhead emissions	0	ROC (lb/day)
FHC from Pumps	0	ROC (lb/day)
FHC from Compressors	0	ROC (lb/day)
Total:	0.0000	ROC (lb/day)

Sumps, Uncovered Wastewater Tanks, and Well Cellars

Efficiency Factor: (70% for well cellars, 0% for uncovered WW tanks, sumps and pits)

Unit Type/Emissions Factor

	Heavy Oil Service	Light Oil Service	
Primary	0.0941	0.138	(lb ROC/ft ² -day)
Secondary	0.0126	0.018	(lb ROC/ft ² -day)
Tertiary	0.0058	0.0087	(lb ROC/ft ² -day)

Surface Area and Type (emissions in lbs/day)

Description/Name	Number	Area (ft ²)	Primary	Secondary	Tertiary
Well Cellars ^(a)	0	0	0.00	0.00	0.00

(a) A 70% reduction is applied for implementation of Rule 344 (Sumps, Pits, and Well Cellars).

0.00 0.00 0.00

Covered Wastewater Tanks

Efficiency Factor: 85%

Surface Area and Type (emissions in lbs/day)

Description/Name	Number	Area (ft ²)	Primary	Secondary	Tertiary
			0.00	0.00	0.00
			0.00	0.00	0.00

Covered Wastewater Tanks Equipped with Vapor Recovery

Efficiency Factor: 95%

Surface Area and Type (emissions in lbs/day)

Description/Name	Number	Area (ft ²)	Primary	Secondary	Tertiary
Wastewater Tank	1	1,176.28	0.00	0.74	0.00
			0.00	0.74	0.00

Oil/Water Separators

Efficiency Factor: varies (85% for cover, 95% for VRS, 0% for open top)

Emissions Factor: 560 (lb ROC/MM Gal)

Type (emissions in lbs/day)

Description/Name	TP-MM Gal	Equipped with Cover	Equipped with VRS	Open Top	Total lb/day
		0.0	0.0	0.0	0.0
		0.0	0.0	0.0	0.0

ATTACHMENT A

Figures and Tables

Table 1
Permitted Potential to Emit

	NOx	ROC	CO	SOx	PM	PM₁₀
Pinal Lease						
lbs/day	0.00	0.74	0.00	0.00	0.00	0.00
TPY	0.00	0.14	0.00	0.00	0.00	0.00

Table 2
Facility Potential to Emit

	NOx	ROC	CO	SOx	PM	PM₁₀
Pinal Lease						
lbs/day	0.00	308.10	0.00	0.00	0.00	0.00
TPY	0.00	17.99	0.00	0.00	0.00	0.00

Table 3
Federal PT-70 Facility Potential to Emit

	NOx	ROC	CO	SOx	PM	PM₁₀
Pinal Lease						
lbs/day	0.00	300.77	0.00	0.00	0.00	0.00
TPY	0.00	16.66	0.00	0.00	0.00	0.00

Table 5
Exempt Emissions

	NOx	ROC	CO	SOx	PM	PM₁₀
Pinal Lease						
TPQ	0.00	0.00	0.00	0.00	0.01	0.01
TPY	0.00	0.00	0.00	0.00	0.05	0.05

I. This Projects "I" NEI-90

II. This Facility's "P1s"

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
PTO 11982 ATC 13145	12/08/06 06/15/09			0.44 0.75	0.08 0.14								
Totals		0.00	0.00	1.19	0.22	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Notes:

- (1) Facility NEI from IDS.
- (2) Totals only apply to permits for this facility ID. Totals may not appear correct due to rounding.
- (3) Because of rounding, values in this table shown as 0.00 are less than 0.005, but greater than zero.

Enter all facility "P2" NEI-90s below:

IV. This Facility's Pre-90 "D" Decreases

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
PTO 11982	12/8/2006			0.44	0.08								
Totals		0.00	0.00	0.44	0.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Notes:

- (1) Facility "D" from IDS.
- (2) Totals only apply to permits for this facility ID. Totals may not appear correct due to rounding.
- (3) Because of rounding, values in this table shown as 0.00 are less than 0.005, but greater than zero.

Table below summarizes facility NEI-90 as equal to: I+ (P1-P2) -D

Term	NOx		ROC		CO		SOx		PM		PM10	
	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
Project "I"	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
P1	0.00	0.00	1.19	0.22	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
P2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
D	0.00	0.00	0.44	0.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FNEI-90	0.00	0.00	0.75	0.14	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Notes:

- (1) Resultant FNEI-90 from above Section I thru IV data.
- (2) Totals only apply to permits for this facility ID. Totals may not appear correct due to rounding.
- (3) Because of rounding, values in this table shown as 0.00 are less than 0.005, but greater than zero.

Term	NOx		ROC		CO		SOx		PM		PM10	
	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
SSN NEL-90	38.01	5.13	57.59	9.00	59.47	9.35	9.14	1.57	18.42	3.36	18.42	3.36
Notes:	(1) This Stationary Source NEI (adjusted) is applicable to all stationary source offset determinations until such time Phase 2 construction begins under ATC 12084. See NEI discussion in Engineering Evaluation in PTO 12273 for more details.											

ATTACHMENT A

Fee Statement

FEE STATEMENT

PTO No. 13145

FID: 03322 Pinal Lease / SSID: 02667



Device Fee

Device No.	Device Name	Fee Schedule	Qty of Fee Units	Fee per Unit	Fee Units	Max or Min. Fee Apply?	Number of Same Devices	Pro Rate Factor	Device Fee	Penalty Fee?	Fee Credit	Total Fee per Device
112556	Wastewater Tank	A6	210.000	3.36	Per 1000 gallons	No	1	1.000	705.60	0.00	0.00	705.60
Device Fee Sub-Totals =									\$705.60	\$0.00	\$0.00	
Device Fee Total =												\$705.60

Fee Statement Grand Total = \$705

Notes:

-
- (1) Fee Schedule Items are listed in APCD Rule 210, Fee Schedule "A".
 - (2) The term "Units" refers to the unit of measure defined in the Fee Schedule.